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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,)	CASE NO. CR 15 – 0427 BLF
Plaintiff,)	STIPULATION AND [PROPOSED] ORDER;
v.)	
RAGINI VECHAM, <i>et al.</i> ,)	
Defendants.)	

WHEREAS, defendant SATYANARAYANA TOTA (“TOTA”) is scheduled for a status hearing before this Court on Tuesday, October 13, 2015, in connection with the above-encaptioned matter now pending in this District;

WHEREAS, defendants RAGINI VECHAM a/k/a/ Ragini Vechman (“VECHAM”), KISHORE PALLAPOTHU a/k/a Krishna Kishore (“PALLAPOTHU”), and RAMANA REDDY (“REDDY”) are separately scheduled for a status hearing before this Court on Tuesday, October 20, 2015, in connection with the above-encaptioned matter;

WHEREAS, lead counsel for the United States has now unexpectedly been scheduled for official

1 travel out of this District on October 20-22, 2015, such that he will be unable to appear before this Court
2 as anticipated on October 20, 2015;

3 WHEREAS, the United States has already produced approximately 18 DVD's containing
4 discovery to certain defense counsel and is currently in process of loading hard drives with further
5 discovery requested by the defendants;

6 WHEREAS, defense counsel is reviewing and will be continuing to review and evaluate
7 discovery already provided by the Government in this matter relative to preparing for the status hearing
8 and setting further dates before the Court;

9 WHEREAS, in light of the foregoing, particularly the need to have all arraigned parties appear
10 on the same day of this Court's criminal calendar and the need for the lead counsel for the United States
11 to be present before this Court at the first appearance before the District Court on this matter, counsel for
12 the parties jointly agree and stipulate that a continuance of this matter is appropriate in order to ensure
13 effective preparation of counsel and continuity of counsel, pursuant to 18 U.S.C. § 3161(h)(7), and that
14 based on their respective calendars and the period needed for the aforementioned discovery matters, an
15 appropriate date for a status hearing is **Tuesday, November 3, 2015, at 9:00 a.m.;**

16 THEREFORE, the parties mutually and jointly stipulate that the matter be continued for
17 defendant TOTA from October 13, 2015, until November 3, 2015, and further jointly stipulate and agree
18 that time should be excluded from October 13, 2015, up to and including November 3, 2015.

19 FURTHERMORE, the parties also mutually and jointly stipulate that the matter be continued for
20 defendants VECHAM, PALLAPOTHU, and REDDY from October 20, 2015, until November 3, 2015,
21 and further jointly stipulate and agree that time should be excluded from October 20, 2015, up to and
22 including November 3, 2015.

23 All the parties agree that excluding time until November 3, 2015, is necessary, given the need to
24 maintain continuity of counsel. The parties also agree that failing to grant a continuance would deny
25 counsel for the defense the reasonable time necessary for effective preparation and continuity of
26 counsel, taking into account the exercise of due diligence. *See* 18 U.S.C. § 3161(h)(7). Finally, the
27 parties agree that the ends of justice served by excluding time from October 13, 2015, up to and
28 including until November 3, 2015, outweigh the best interest of the public and the defendant in a speedy

1 trial. *Id.* § 3161(h)(7).
2

3 **IT IS SO STIPULATED.**
4

5 DATED: October 8, 2015

/s/

ETHAN A. BALOGH
Attorney for SATYANARAYANA TOTA

8 DATED: October 8, 2015

/s/

EDWIN PRATHER
Attorney for RAGINI VECHAM
a/k/a/ Ragini Vechman
and
Attorney for KISHORE PALLAPOTHU
a/k/a Krishna Kishore

13 DATED: October 8, 2015

/s/

ISMAIL RAMSEY
Attorney for RAMANA REDDY

16 DATED: October 8, 2015

BRIAN J. STRETCH
Acting United States Attorney

18 /s/

TIMOTHY J. LUCEY
Assistant United States Attorney

21 **IT IS SO ORDERED.**

22 **DATED:** _____
23

HONORABLE BETH L. FREEMAN
United States District Court